



KREINDLER & KREINDLER LLP | 485 Lexington Avenue | New York, NY 10017-2629

office: 212.687.8181 | fax: 212.972.9432 | [www.kreindler.com](http://www.kreindler.com)

August 16, 2021

VIA ECF

The Honorable Sarah Netburn  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

In response to this Court's August 12, 2021 Order, please see the following declarations of Megan Wolfe Benett, James P. Kreindler, Andrew J. Maloney and Steven R. Pounian.

Respectfully,

/s/ Megan Wolfe Benett  
KREINDLER & KREINDLER LLP  
485 Lexington Avenue  
New York, New York 10017  
Tel.: 212-687-8181  
Email: [mbenett@kreindler.com](mailto:mbenett@kreindler.com)

Enclosures

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN)
---	------------------------

*This document relates to:*

All Actions

**DECLARATION OF MEGAN WOLFE BENETT**

I, Megan Wolfe Benett, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury the following:

1. I am an attorney admitted to practice in this Court in the above-captioned matter, a partner at Kreindler & Kreindler LLP and counsel to Plaintiffs in the above referenced multi-district litigation proceeding In Re: Terrorist Attacks on September 11, 2001, Civil Action 03 MD 1570 (GBD) (SN) (“September 11<sup>th</sup> Terrorist Attacks Lawsuit”) and submit this declaration in response to the Court’s August 12, 2021 Order (ECF No. 7011).

2. In connection with the September 11<sup>th</sup> Terrorist Attacks Lawsuit, I signed the FBI Protective Order (ECF No. 4255 at 10) and am aware of and have reviewed the Protective Order (ECF No. 1900). For the past four years, I have been one of the primary attorneys at Kreindler and Kreindler LLP representing the family members of those murdered in the September 11<sup>th</sup> Terrorist Attacks in this lawsuit against the Kingdom of Saudi Arabia (“Kingdom”), alleging that the Kingdom and its agents conspired with and provided material support to the September 11<sup>th</sup> hijackers.

3. As part of the September 11<sup>th</sup> Terrorist Attacks Lawsuit, I deposed the Kingdom of Saudi Arabia’s former Ministry of Foreign Affairs, Islamic Affairs Division employee Musaed al-Jarrah on June 17 and 18, 2021.

4. I obtained a copy of the rough transcript of the Jarrah deposition at the end of each day that he was deposed and a final copy of the transcript from both days of the Jarrah deposition on June 28, 2021 from Golkow Litigation Services, both an unredacted and a redacted copy. The only individuals at Kreindler and Kreindler LLP on that email were myself, Steven R. Pounian, Jim Kreindler, Andrew J. Maloney and a paralegal in our office.

5. On July 7, 2021, Golkow Litigation Services sent an email with links to the video of the Jarrah deposition. Again, the only individuals at Kreindler and Kreindler LLP on that email were myself, Steven R. Pounian, Jim Kreindler, Andrew J. Maloney and a paralegal in our office.

6. At no time did I share the Jarrah deposition transcript or videos with anyone unauthorized to see it under the Protective Order and the FBI Protective Order.

7. At no time did I direct anyone to share the Jarrah deposition transcript or videos with anyone unauthorized to see it under the Protective Order and the FBI Protective Order.

8. Following publication of the Michael Isikoff article, our firm conducted a review of the handling of the Jarrah deposition transcript after its receipt by the firm, including searches performed by the firm's information technology director of all outgoing emails.

9. Based on that review, and to my knowledge, no one with the firm or anyone acting on its direction shared the Jarrah deposition transcript with anyone unauthorized by the Protective Order and the FBI Protective Order.

10. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: New York, New York  
August 16, 2021

KREINDLER & KREINDLER LLP

By: /s/ Megan Wolfe Benett  
MEGAN WOLFE BENETT  
485 Lexington Avenue  
New York, New York 10017  
Tel.: 212-687-8181  
Email: mbenett@kreindler.com

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN)
---	------------------------

*This document relates to:*

All Actions

**DECLARATION OF JAMES P. KREINDLER**

I, James P. Kreindler, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury the following:

1. I am an attorney admitted to practice in this Court in the above-captioned matter, a partner at Kreindler & Kreindler LLP and represent Plaintiffs in the above referenced multi-district litigation proceeding In Re: Terrorist Attacks on September 11, 2001, Civil Action 03 MD 1570 (GBD) (SN) (“September 11<sup>th</sup> Terrorist Attacks Lawsuit”). I submit this declaration in response to the Court’s August 12, 2021 Order (ECF No. 7011).

2. In connection with the September 11<sup>th</sup> Terrorist Attacks Lawsuit, I signed the FBI Protective Order (ECF No. 4255 at 10) and am aware of and have reviewed the Protective Order (ECF No. 1900). I am co-lead counsel to the family members of those murdered in the September 11<sup>th</sup> Terrorist Attacks in this lawsuit against the Kingdom of Saudi Arabia (“Kingdom”), alleging that the Kingdom and its agents conspired with and provided material support to the September 11<sup>th</sup> hijackers.

3. I obtained a copy of the rough transcript of the Jarrah deposition at the end of each day that he was deposed and a final copy of the transcript from both days of the Jarrah deposition on June 28, 2021 from Golkow Litigation Services, both an unredacted and a redacted copy.

4. On July 7, 2021, Golkow Litigation Services sent an email with links to the video of the Jarrah deposition.

5. At no time did I share the Jarrah deposition transcript or videos with anyone unauthorized to see it under the Protective Order and the FBI Protective Order.

6. At no time did I direct anyone to share the Jarrah deposition transcript or videos with anyone unauthorized to see it under the Protective Order and the FBI Protective Order.

7. To my knowledge, no one with the Kreindler firm or anyone acting on its direction shared the Jarrah deposition transcript with anyone unauthorized by the Protective Order and the FBI Protective Order.

8. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: New York, New York  
August 16, 2021

KREINDLER & KREINDLER LLP

By: /s/ James P. Kreindler  
JAMES P. KREINDLER  
485 Lexington Avenue  
New York, New York 10017  
Tel.: 212-687-8181  
Email: jkreindler@kreindler.com

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN)
---	------------------------

*This document relates to:*

All Actions

**DECLARATION OF ANDREW J. MALONEY**

I, Andrew J. Maloney, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury the following:

1. I am an attorney admitted to practice in this Court in the above-captioned matter, a partner at Kreindler & Kreindler LLP and represent Plaintiffs in the above referenced multi-district litigation proceeding In Re: Terrorist Attacks on September 11, 2001, Civil Action 03 MD 1570 (GBD) (SN) (“September 11<sup>th</sup> Terrorist Attacks Lawsuit”). I submit this declaration in response to the Court’s August 12, 2021 Order (ECF No. 7011).

2. In connection with the September 11<sup>th</sup> Terrorist Attacks Lawsuit, I signed the FBI Protective Order (ECF No. 4255 at 10) and am aware of and have reviewed the Protective Order (ECF No. 1900). I am co-liaison counsel to the family members of those murdered in the September 11<sup>th</sup> Terrorist Attacks in this lawsuit against the Kingdom of Saudi Arabia (“Kingdom”), alleging that the Kingdom and its agents conspired with and provided material support to the September 11<sup>th</sup> hijackers.

3. I obtained a copy of the rough transcript of the Jarrah deposition at the end of each day that he was deposed and a final copy of the transcript from both days of the Jarrah deposition on June 28, 2021 from Golkow Litigation Services, both an unredacted and a redacted copy.

4. On July 7, 2021, Golkow Litigation Services sent an email with links to the video of the Jarrah deposition.

5. At no time did I share the Jarrah deposition transcript or videos with anyone unauthorized to see it under the Protective Order and the FBI Protective Order.

6. At no time did I direct anyone to share the Jarrah deposition transcript or videos with anyone unauthorized to see it under the Protective Order and the FBI Protective Order.

7. To my knowledge, no one with the Kreindler firm or anyone acting on its direction shared the Jarrah deposition transcript with anyone unauthorized by the Protective Order and the FBI Protective Order.

8. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: New York, New York  
August 16, 2021

KREINDLER & KREINDLER LLP

By: /s/ Andrew J. Maloney  
ANDREW J. MALONEY  
485 Lexington Avenue  
New York, New York 10017  
Tel.: 212-687-8181  
Email: amaloney@kreindler.com

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN)
---	------------------------

*This document relates to:*

All Actions

**DECLARATION OF STEVEN R. POUNIAN**

I, Steven R. Pounian, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury the following:

1. I am an attorney admitted to practice in this Court in the above-captioned matter, of counsel at Kreindler & Kreindler LLP and represent Plaintiffs in the above referenced multi-district litigation proceeding In Re: Terrorist Attacks on September 11, 2001, Civil Action 03 MD 1570 (GBD) (SN) (“September 11<sup>th</sup> Terrorist Attacks Lawsuit”). I submit this declaration in response to the Court’s August 12, 2021 Order (ECF No. 7011).

2. In connection with the September 11<sup>th</sup> Terrorist Attacks Lawsuit, I signed the FBI Protective Order (ECF No. 4255 at 10) and am aware of and have reviewed the Protective Order (ECF No. 1900). For the past four years, I have been one of the primary attorneys at Kreindler and Kreindler LLP representing the family members of those murdered in the September 11<sup>th</sup> Terrorist Attacks in this lawsuit against the Kingdom of Saudi Arabia (“Kingdom”), alleging that the Kingdom and its agents conspired with and provided material support to the September 11<sup>th</sup> hijackers.

3. I obtained a copy of the rough transcript of the Jarrah deposition at the end of each day that he was deposed and a final copy of the transcript from both days of the Jarrah deposition on June 28, 2021 from Golkow Litigation Services, both an unredacted and a redacted copy.

4. On July 7, 2021, Golkow Litigation Services sent an email with links to the video of the Jarrah deposition.

5. At no time did I share the Jarrah deposition transcript or videos with anyone unauthorized to see it under the Protective Order and the FBI Protective Order.

6. At no time did I direct anyone to share the Jarrah deposition transcript or videos with anyone unauthorized to see it under the Protective Order and the FBI Protective Order.

7. To my knowledge, no one with the Kreindler firm or anyone acting on its direction shared the Jarrah deposition transcript with anyone unauthorized by the Protective Order and the FBI Protective Order.

8. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: New York, New York  
August 16, 2021

KREINDLER & KREINDLER LLP

By: /s/ Steven R. Pounian  
STEVEN R. POUNIAN  
485 Lexington Avenue  
New York, New York 10017  
Tel.: 212-687-8181  
Email: spounian@kreindler.com